



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 18, 2020

Keeva Shultz
Agent for Rotam Agrochemical Company Ltd.
Rotam Agrochemical Company, Ltd
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Registration Review Label Mitigation for Rimsulfuron
Product Name: Rimsulfuron-S 25% SG
EPA Registration Number: 83100-46
Application Date: 12/19/2017
Decision Number: 558365

Dear Ms. Shultz:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Sulfonylurea (SU) Herbicides Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

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Decision No. 558365

If you have any questions about this letter, please contact Srijana Shrestha by phone at 703-305-6471, or via email at Shrestha.Srijana@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

[Master Label]

RIMSULFURON GROUP 2 HERBICIDE

Rimsulfuron-S 25% SG

A water soluble granule herbicide for use in field corn.

ACTIVE INGREDIENT:	BY WT.
Rimsulfuron: N-((4,6-dimethoxyypyrimidin-2-yl)aminocarbonyl)-3-(ethylsulfonyl)-2-pyridinesulfonamide	25.0%
OTHER INGREDIENTS:	75.0%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand this label, find someone to explain it to you in detail.)

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by the poison control center or doctor. • Do not give anything to an unconscious person.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For 24-Hour Medical Emergency Assistance (Human or Animal) call: 1-800-222-1222 . For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident) call CHEMTREC: 1-800-424-9300 .	

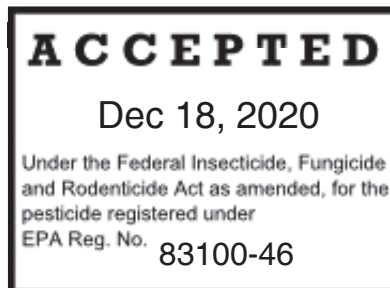
[Optional referral statements when booklets and container labels are used:]

[See label booklet for [complete] [additional] [First Aid,] [Precautionary Statements,] [Directions For Use,] and [Storage and Disposal.]]

Manufactured [By] [For]:
Rotam Agrochemical Co. Ltd.
26/F, E-Trade Plaza
24 Lee Chung Street
Chai Wan, Hong Kong

EPA Reg. No.: 83100-46
EPA Est. No.:

Net Contents: _____ [Lbs./Kgs.]



[Table of Contents to be added before the Precautionary Statement]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Harmful if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some of the materials that are chemical-resistant to this product are listed below.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves, such as butyl rubber ≥ 14 mils, or natural rubber ≥ 14 mils, or neoprene rubber ≥ 14 mils, or nitrile rubber ≥ 14 mils
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROL STATEMENTS

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR, Part 170, Section 170.240 (d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands thoroughly before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. If pesticide gets on skin, wash immediately with soap and water.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. **Do not** contaminate water by cleaning of equipment or disposal of equipment washwaters or rinsate.

Surface Water Label Advisory

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow groundwater. This product is classified as having high potential for reaching surface water via runoff for months or more after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of rimsulfuron from runoff water and sediment. Runoff of this product will be greatly reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours.

Windblown Soil Particles Advisory

Rimsulfuron-S 25% SG has the potential to move off-site due to wind erosion. Soils that are subject to wind erosion usually have a high silt and/or fine to very fine sand fractions and low organic matter content. Other factors which can affect the movement of windblown soil include the intensity and direction of prevailing winds, vegetative cover, site slope, rainfall, and drainage patterns. Avoid applying **Rimsulfuron-S 25% SG** if prevailing local conditions may be expected to result in off-site movement.

Non-Target Organism Advisory

This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated area. Protect the forage and habitat of non-target organisms by minimizing spray drift. For further guidance and instructions on how to minimize spray drift, refer to the Spray Drift Management section of this label.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 4 hours.

The following PPE is required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water:

- Coveralls
- Chemical-resistant gloves, such as butyl rubber ≥ 14 mils, or natural rubber ≥ 14 mils, or neoprene rubber ≥ 14 mils, or nitrile rubber ≥ 14 mils
- Shoes plus socks

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read entire label before using this product.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

PRODUCT INFORMATION

Use **Rimsulfuron-S 25% SG** herbicide only in accordance with instructions on this label or in separate published labeling. Rotam will not be responsible for losses or damage resulting from use of this product in any manner not specifically instructed by Rotam. **Rimsulfuron-S 25% SG** is a water soluble granule herbicide formulation containing 25% active ingredient by weight. **Rimsulfuron-S 25% SG** is for use in burndown and residual control applications for control of certain annual grass and broadleaf weeds when applied pre-emergence and post-emergence to field corn.

Restrictions:

- **Do not** apply to sweet corn, popcorn, or field corn grown for seed.
- **Do not** make pre-emergence applications to coarse-textured soils (sandy loam, loamy sand, or sand) that have less than 1% organic matter.
- **Do not** make aerial applications in the states of California and New York.
- **Do not** apply more than 2 oz. of **Rimsulfuron-S 25% SG** per acre (0.0313 lb. a.i./acre) per year.
- Limit pre-emergence rate of **Rimsulfuron-S 25% SG** to a maximum of 1.25 oz. product (0.0195 lb. a.i./acre) if following with post-emergence applications of other Rimsulfuron products.
- Allow a minimum of 3 weeks between pre-emergence application of **Rimsulfuron-S 25% SG** and post-emergence applications of the herbicides noted below.
- Make sequential applications after the corn has reached the 2-collar stage but before the corn exceeds the maximum application height listed on the respective product labels.
- **Do not** apply more than 2 oz. of **Rimsulfuron-S 25% SG** per acre (0.0313 lb. a.i./acre) per application.
- **Do not** make more than 4 applications per year, when using the reduced application rate.

APPLICATION INFORMATION

Apply **Rimsulfuron-S 25% SG** to "Roundup Ready" corn in tank mix combinations with glyphosate herbicides such as Glyphos® or Glyphos® X-TRA, or similar products to extend control of weeds that emerge later. Residual weed control is dependent on soil moisture and is optimized by rainfall or sprinkler irrigation to activate the herbicide.

Adequate soil moisture is required to maximize product performance. Rainfall or irrigation within 5 to 7 days after application will improve **Rimsulfuron-S 25% SG** residual activity. If more than ½ inch of rainfall or irrigation is not received within 5 to 7 days after application, cultivate or follow with a sequential application of Primero® or Accent® herbicide, if determined necessary.

Application Timing

Allow at least 21 days between pre-emergence application of **Rimsulfuron-S 25% SG** and post-emergence applications of rimsulfuron-containing products. For sequential applications - apply after the 2-collar stage but before the corn reaches the maximum application height referenced on the label of product being applied.

Make applications of **Rimsulfuron-S 25% SG** to field corn hybrids with a relative maturity (RM) of equal to or greater than 77 days (including yellow dent, hard endosperm, "food grade"; waxy and High-Oil corn). Crop safety information is not available for all field corn varieties (including field corn hybrids less than 77 days RM, white corn hybrids or Hi-Lysine hybrids). In addition, Rotam does not have access to data from seed companies. Injury resulting from the use of **Rimsulfuron-S 25% SG** on these varieties or types of corn is the responsibility of the user. Contact your seed supplier before making applications of **Rimsulfuron-S 25% SG** to any of these corn varieties or types. Seed companies provide information in publications that indicate "Crop Response Warning", "Warning", or "Sensitive" notations for the use of ALS herbicides on corn hybrids having a RM of equal to or greater than 77 days. As indicated in these publications, user should proceed with caution when using sulfonylurea herbicides (including **Rimsulfuron-S 25% SG**) on these hybrids. Consult with your local Rotam representative for additional information regarding corn hybrid sensitivity to **Rimsulfuron-S 25% SG**.

Do not make applications greater than a total of 2.0 oz. (0.0313 lb. a.i. /acre) of **Rimsulfuron-S 25% SG** (or 0.5 oz. active ingredient rimsulfuron) during the crop season, including pre-emergent and post-emergent applications or combinations of pre/post applications of **Rimsulfuron-S 25% SG**, and application(s) of other products that contain rimsulfuron. Pre-emergent rates of **Rimsulfuron-S 25% SG** should be limited to a maximum of 1.25 oz. of product if application will be followed with a post-emergence application of the rimsulfuron-containing products.

FALLOW

Use Rates

Make application of 1 ounce (0.0156 lb. a.i. rimsulfuron) - 2 ounces (0.0313 lb. a.i. rimsulfuron) of **Rimsulfuron-S 25% SG** per acre.

Application Timing

Apply as a fallow treatment in the spring or fall when weeds are actively growing and most weeds have emerged.

Tank Mixtures for fallow use

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Use **Rimsulfuron-S 25% SG** as a fallow treatment and tank mix with other herbicides that are registered for use in fallow. **Do not** use a product in a tank mixture with **Rimsulfuron-S 25% SG** if the directions on the tank mix partner label conflict with this **Rimsulfuron-S 25% SG** label.

FIELD CORN - PRE-EMERGENCE

Use Rates - Pre-Emergence

Apply 0.5 oz. (0.0078 lb. a.i.) - 2.0 oz. (0.0313 lb. a.i.) per acre of **Rimsulfuron-S 25% SG** before corn emerges. See information above for limitations with additional applications of rimsulfuron-containing products. Apply 1 oz. (0.0156 lb. a.i.) - 1.5 oz. (0.0234 lb. a.i.) per acre for most applications. Consult your local Rotam representative for additional recommendations.

Application Timing - Pre-Emergence

Apply **Rimsulfuron-S 25% SG** pre-plant or pre-emergence to corn. Applications of **Rimsulfuron-S 25% SG** made before weeds have emerged will provide residual control of labeled weeds. If weeds have already emerged, the addition of spray adjuvants as noted below is recommended for optimum control.

Pre-Emergence Restrictions:

- **Do not** apply more than 2 oz. (0.0313 lb. a.i.) of **Rimsulfuron-S 25% SG** per acre per year.
- Limit pre-emergence rate of **Rimsulfuron-S 25% SG** to a maximum of 1.25 oz. (0.0195 lb. a.i.) per acre if following with post-emergence applications of the rimsulfuron product noted above.
- Allow a minimum of 3 weeks between pre-emergence application of **Rimsulfuron-S 25% SG** and post-emergence applications of the herbicides noted above.
- Make sequential applications after the corn has reached the 2-collar stage but before the corn exceeds the maximum application height listed on the respective product labels.
- **Do not** apply more than 2 oz. (0.0313 lb. a.i.) of **Rimsulfuron-S 25% SG** per acre per application.

- **Do not** make more than 4 applications per year, when using the reduced application rate.
- **RTI:** Allow a minimum of 14 days between applications.

FIELD CORN - POST-EMERGENCE

Use Rates - Post-Emergence

Apply 0.5 - 2.0 oz. per acre of **Rimsulfuron-S 25% SG** as a post-emergence broadcast application. Apply 1 oz. per acre (0.0156 lb. a.i./acre) for most applications. Consult your local Rotam representative for additional recommendations.

Post-Emergence Restrictions:

- **Do not** apply more than 1.0 oz. active ingredient (4 oz. product) rimsulfuron per acre (0.0156 lb. a.i. rimsulfuron/acre) during the crop year from all sources. This includes combinations of pre-emergence and post-emergence applications of **Rimsulfuron 25% SG** or other rimsulfuron-containing products.
- **Do not** apply more than 2 oz. (0.0313 lb. a.i.) of **Rimsulfuron-S 25% SG** per acre per year.
- Allow a minimum of 3 weeks between pre-emergence application of **Rimsulfuron-S 25% SG** and post-emergence applications of the herbicides noted below.
- **Do not** apply more than 2 oz. (0.0313 lb. a.i.) of **Rimsulfuron-S 25% SG** per acre per application.
- **Do not** make more than 4 applications per year, when using reduced application rates.
- **RTI:** Allow a minimum of 14 days between applications.

Application Timing - Post-Emergence

To Crop: Apply **Rimsulfuron-S 25% SG** to corn that is no greater than 12 inches tall. **Do not** apply to corn taller than 12 inches or corn that has 6 or more leaf collars, whichever is most restrictive. Post-emergent applications of **Rimsulfuron-S 25% SG** will provide contact control of labeled weeds and limited residual control of weeds that emerge later.

To Weeds: Apply **Rimsulfuron-S 25% SG** with tank mixtures of glyphosate or glufosinate herbicides after weeds have emerged but before weeds are taller than maximum size listed on the glyphosate or glufosinate herbicide labels. Ensure adequate soil moisture for optimum results (see "**APPLICATION INFORMATION**" section above).

SPRAY ADJUVANTS

Make applications of **Rimsulfuron-S 25% SG** to control emerged weeds with a nonionic surfactant and an ammonium nitrogen fertilizer. **Do not** add surfactants or adjuvants to tank mixtures if using products that already contain an adjuvant such as RoundUp® Weathermax® or Liberty®. The use of a crop oil concentrate (instead of a nonionic surfactant) is recommended for pre-emergence burndown applications of **Rimsulfuron-S 25% SG**. Consult your local Rotam representative prior to using other adjuvant systems.

Petroleum-based Crop Oil Concentrate (COC) or Modified Seed Oil (MSO)

- Make applications at 1% v/v (1 gallon per 100 gallons of spray solution) or 2% v/v under dry conditions.
- Use an MSO at 0.5% v/v (0.5 gallon per 100 gallons of spray solution) if specifically recommended on the adjuvant product labeling.
- Oil adjuvants must contain at least 80% high quality, modified vegetable seed oil or petroleum (mineral) and have at least 15% surfactant emulsifiers.

Nonionic Surfactant (NIS)

- Make applications at 0.25% v/v (1 quart per 100 gallons of spray solution).
- Surfactants must have a hydrophilic/lipophilic balance (HLB) greater than 12 and contain at least 60% nonionic surfactant.

Ammonium Nitrogen Fertilizer

- Use 2 quarts per acre of a high-quality urea ammonium nitrate (UAN) such as 2 lbs. per acre of a spray-grade ammonium sulfate (AMS), 28%N or 32%N.
- After crop has emerged, **do not** use liquid nitrogen fertilizer as the total carrier solution.

Special Adjuvant Types

- Use of combination adjuvant products at doses that provide the required amount of NIS and ammonium nitrogen fertilizer is allowed. Consult product labeling for use rates and restrictions.
- **Do not** use any other mixtures or adjuvant rates in combination with **Rimsulfuron-S 25% SG**, unless instructed to do so by Rotam labeling.

WEEDS CONTROLLED/SUPPRESSED IN FIELD CORN

Pre-Emergence Control	
Grass Weeds	Broadleaf Weeds

Barnyardgrass Bluegrass, annual* Crabgrass, large* Foxtail (bristly, giant, green, yellow) Panicum, fall* Signalgrass, broadleaf* Wheat, Volunteer Wild Oat*	Carpetweed* Chamomile, false Cocklebur* Filaree, Redstem Henbit Jimsonweed* Kochia (ALS-sensitive) Lambsquarters, common Morningglory, ivyleaf* Mustard (birdsrape, black) Nightshade* (hairy, black) Palmer, amaranth* Pigweed (prostrate, redroot, smooth) Purslane, common Ragweed, common* Russian thistle, seedling* Smartweed, Pennsylvania* Velvetleaf*
Post-Emergence Control	
Grass Weeds (1-2")	Broadleaf Weeds (1-3")
Barley, volunteer Barnyardgrass Bluegrass, annual Crabgrass, large (½") Cupgrass, woolly (1") Foxtail (bristly, giant, green, yellow) Johnsongrass, seedling* Millet, wild-proso* Panicum, fall Quackgrass* Ryegrass, Italian* Shattercane (4") Signalgrass, broadleaf* Stinkgrass* Wheat, volunteer Wild oat* Yellow nutsedge*	Alfalfa, volunteer** Canada, thistle* Chickweed, common Cocklebur* Dandelion (6" diameter) Henbit Kochia Lambsquarters, common* Morningglory, ivyleaf* Mustard (birdsrape, black, wild) Nightshade, hairy* Pigweed, (prostrate, redroot, smooth) Purslane, common* Ragweed, common* Shepherd's purse Smartweed, Pennsylvania* Wild radish Velvetleaf*
* Suppression/Partial control ** Except in California.	

TANK MIXTURES

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Tank mix **Rimsulfuron-S 25% SG** with full or reduced rates of other products registered for use in corn. If the directions for use are in contrast with this **Rimsulfuron-S 25% SG** label, **do not** use in a tank mixture with **Rimsulfuron-S 25% SG**.

Tank Mix Compatibility Testing

Perform a jar test prior to tank mixing to ensure compatibility of **Rimsulfuron-S 25% SG** and other pesticides. Use a clear quart jar with lid and mix the tank mix ingredients in their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately ½ hour. If the mixture balls-up, forms flakes, sludge, gel, oily film or layers, or other precipitates, **do not** use it because it is not compatible.

Pre-Emergence to Corn

For Additional Control of Grass and Broadleaf Weeds

Tank mix **Rimsulfuron-S 25% SG** with full or reduced rates of pre-emergence grass and broadleaf herbicides such as atrazine, Stalwart® C, Stalwart® Xtra, Stalwart® Xtra Lite, Visor® S-MOC ATZ, Cinch®, Cinch® ATZ, "Harness", "Outlook", "Balance PRO", "Lumax", or equivalent product for additional residual activity or burndown activity on weeds that have already emerged. Consult the tank mix partner labeling for specific use rate and soil restrictions.

Post-Emergence to Corn

Tank Mixtures with Glufosinate

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Tank mix applications of **Rimsulfuron-S 25% SG** with glufosinate herbicides may be made to corn hybrids containing the "LibertyLink" gene. Confirm with your seed supplier that seeds are "LibertyLink" hybrid before making any applications containing glufosinate herbicides.

Rimsulfuron-S 25% SG at 0.75 oz. (0.0117 lb. a.i./acre), will provide improved burndown and/or limited residual activity on the weeds listed below, when used in tank mixtures with glufosinate herbicide, as compared to glufosinate used alone:

Foxtail (giant, yellow); Lambsquarters, common; Pigweed, redroot; Velvetleaf.

Tank Mixtures with Glyphosate

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Tank mix applications of **Rimsulfuron-S 25% SG** with glyphosate herbicides may be made to "Roundup Ready" corn hybrids. Confirm with your seed supplier that seeds are a "Roundup Ready" corn hybrid before making any applications containing glyphosate herbicides.

Rimsulfuron-S 25% SG at 1 oz. (0.0156 lb. a.i./acre) will provide improved burndown and/or residual activity on the weeds listed in the table below when used in a tank mixture with a glyphosate herbicide, as compared to using glyphosate alone.

Alfalfa, volunteer*	Johnsongrass, seedling	Sandbur (field, longspine)
Barley, volunteer	Kochia	Shepherd's purse
Barnyardgrass	Lambsquarters, common	Signalgrass, broadleaf
Bluegrass, annual	Millet, wild-proso	Smartweed, Pennsylvania
Canada thistle	Morningglory, ivyleaf	Stinkgrass
Chamomile, false	Mustard (birdsrape, black, wild)	Velvetleaf
Chickweed, common	Nightshade, hairy	Wheat, volunteer
Cocklebur	Panicum, fall	Wild buckwheat
Crabgrass	Pigweed (prostrate, redroot, smooth)	Wild oat
Dandelion (6" diameter)	Purslane, common	Wild radish
Filaree, redstem	Quackgrass	Yellow nutsedge
Foxtail (bristly, giant, green, yellow)	Ragweed, common	
Henbit	Ryegrass, Italian	

*Except in California.

Kochia

For improved control of kochia, tank mix **Rimsulfuron-S 25% SG** with $\frac{1}{3}$ to $\frac{2}{3}$ pint per acre of "Starane" or equivalent. Make applications at the higher rates listed if weed pressure is heavy. Reference the "Starane" label for specific use information and restrictions. Tank mix applications of **Rimsulfuron-S 25% SG** with "Starane" and $\frac{1}{16}$ to $\frac{1}{8}$ lb. dicamba active ingredient (such as 2 to 4 fl. oz. of Topeka®, "Banvel", "Clarity", or equivalent) for broader spectrum weed control.

Broadleaf Weeds – Added Control

For improved burndown or residual control of broadleaf weeds (including common waterhemp, common ragweed, common lambsquarters, and velvetleaf), tank mix **Rimsulfuron-S 25% SG** with 2 pints per acre of "Lumax" or 2 $\frac{1}{2}$ pints per acre of "Lexar". Use a nonionic surfactant when applying mixtures of **Rimsulfuron-S 25% SG** plus "Lumax" or "Lexar". Reference the "Lumax" or "Lexar" product labels for additional application information, use restrictions and rotational crop information.

For improved burndown or residual control of broadleaf weeds (including common waterhemp, common ragweed, common lambsquarters, and velvetleaf), tank mix **Rimsulfuron-S 25% SG** with 0.5 to 0.75 fluid ounce per acre of "Impact" or equivalent plus atrazine at 0.375 to 1.5 pounds active per acre.

Use methylated seed oil when applying mixtures of **Rimsulfuron-S 25% SG** plus “Impact” at 0.5 fluid ounce per acre. Reference the “Impact” product label for additional application information, use restrictions and rotational crop information.

Tank Mix Restrictions:

- **Do not** apply tank mixtures of **Rimsulfuron-S 25% SG** with glyphosate herbicides to conventional corn hybrids that **do not** contain the “Roundup Ready” gene.
- **Do not** apply tank mixtures of **Rimsulfuron-S 25% SG** with glufosinate herbicides to conventional corn hybrids that do not contain the “LibertyLink” gene.
- To avoid adverse crop response or antagonism, applications of the products below should not be made for at least 7 days before or 3 days after the application of **Rimsulfuron-S 25% SG**. **Do not** tank mix **Rimsulfuron-S 25% SG** with “Laddok” and “Basagran” or severe adverse crop response may occur. **Do not** make tank mixture applications of **Rimsulfuron-S 25% SG** with foliar-applied organophosphate (OP) insecticides such as malathion, parathion, “Lorsban”, etc., as severe adverse crop response may occur.
- **Do not** exceed product label application rates. **Do not** make tank mixture applications of **Rimsulfuron-S 25% SG** with other products that contain rimsulfuron, unless the label of either tank mix partner provides specific information on the maximum use rate that may be used.

Applications of **Rimsulfuron-S 25% SG** may be made in tank mixture with glyphosate and other products registered for use in field corn – except as noted in restrictions and precautions in this label or the tank mix partner label.

Apply **Rimsulfuron-S 25% SG** in tank mix combinations with full or reduced rates of other products provided that:

- The tank mix product is labeled at the same application timing and method, with same adjuvants, and use restrictions as **Rimsulfuron-S 25% SG** and other products used in the tank mixture.
- The tank mixture partner product label does not specifically prohibit the use.

Tank Mix Precautions:

- Read and follow all precautions, restrictions, and applicable use directions specified on the tank mix partner product labels and fact sheets.
- Weed control and adverse crop response with tank mixes not specifically recommended on this label are the responsibility of the user and manufacturer of the tank mix product if recommended.
- Under stressful conditions, a corn plant’s physiological disposition is to develop fused tissue that emerges from the whorl after the V-11 stage. When making tank mix applications to small corn (V-3 stage or smaller) under early stressful conditions, the incidence of this growth pattern may increase when a product containing dicamba (i.e., “Clarity”, “Marksman”) is applied. For a description of these stressful conditions, see the **ENVIRONMENTAL CONDITIONS** section of this label.

CHEMIGATION

Do not make applications of **Rimsulfuron-S 25% SG** through any type of irrigation system.

MIXING INSTRUCTIONS

1. Fill the tank $\frac{1}{4}$ to $\frac{1}{3}$ full with water.
2. Add the required amount of **Rimsulfuron-S 25% SG** while agitating the tank.
3. Maintain agitation until the **Rimsulfuron-S 25% SG** is dispersed fully (at least 5 minutes).
4. Once product is fully dispersed, maintain agitation and fill tank with water. Thoroughly mix **Rimsulfuron-S 25% SG** with water before adding any other material.
5. Add tank mix partners (if desired), as the tank is filling with water. Then, if needed, add the necessary amount of spray adjuvant. Add the spray adjuvant last.
6. Tank mix partners can settle out if agitation of the tank mix is not maintained. Thoroughly agitate and mix before using, if settling occurs.
7. To avoid product degradation, make application of **Rimsulfuron-S 25% SG** mixture within 48 hours of mixing.

Consult the tank mix partner label for ground or surface water advisory information - follow all label precautions and restrictions.

BROADCAST APPLICATIONS

To ensure thorough coverage of the weeds and optimum product performance, use a minimum of 15 gallons of water per acre (GPA). For light, scattered stands of weeds, use a minimum of 10 GPA. Use spray nozzles and pressure that will deliver medium spray droplets as indicated by ASAE Standard S572. If using nozzles that deliver coarse spray droplets

to reduce drift, increase spray volume to maintain coverage on small weeds. Adjust the spray boom to the lowest possible spray height suggested in manufacturers' specifications for optimal product performance and minimal spray drift. Set up equipment to avoid applying an excessive rate directly over the rows and into the corn plant whorl. Turning while spraying, overlaps, starting, stopping, or slowing may result in adverse crop response.

AERIAL APPLICATION

Do not make aerial applications in the states of California and New York.

When making applications by air, use a minimum of 5 GPA and medium or coarse nozzles that provide optimum spray distribution and maximum coverage. **Do not** make applications during temperature inversions, when wind speed is less than 3 mph or above 10 mph, or when conditions or winds favor poor coverage and/or off-target spray drift.

ROTATIONAL CROP GUIDELINES

Observe the following rotational intervals when using **Rimsulfuron-S 25% SG**:

1 OZ. (0.0156 lb. a.i./acre) MAXIMUM USE RATE	
Rotation Crop	Interval (Months)
Corn (field), Potatoes	Anytime
STS Soybeans***, Tomato	1
Cereals, Winter (wheat)	3
Cereals, Spring (wheat, oats, barley)	9
Alfalfa*†, Beans (dry and snap), Canola†, Corn (pop or sweet), Cotton†, Cucumber, Flax, Peas, Rice**, Red Clover†, Sorghum†, Soybeans, Sunflower, Sugarbeets†	10
Crops Not Listed	18
* For sprinkler irrigated fields in Idaho, Northern Nevada, and Utah, use deep fall tillage such as plowing prior to planting alfalfa for best results. Product degradation may be less on furrow-irrigated soils and may result in adverse crop response. † 18 months in the Red River Valley region of MN and ND. The rotation intervals must be extended to 18 months if drought conditions prevail after application and before the rotational crop is planted, unless sprinkler irrigation has been applied and totals greater than 15" during the growing season, in all other areas. ** Soils with pH less than 6.5. *** Sulfonyleurea Tolerant Soybean.	

2 OZ. (0.0313 lb. a.i./acre) MAXIMUM USE RATE	
Rotation Crop	Interval (Months)
Corn (field), Potatoes	Anytime
Tomato	1
Cereals, Winter (wheat)	3
STS Soybeans***	4
Cereals, Spring (wheat, oats, barley)	9
Beans (dry and snap), Corn (pop or sweet), Cotton†, Cucumber, Flax, Soybeans, Sunflower	10
Crops Not Listed	18
† The rotation intervals must be extended to 18 months if drought conditions prevail after application and before the rotational crop is planted, unless sprinkler irrigation has been applied and totals greater than 15" during the growing season, in all other areas. *** Sulfonyleurea Tolerant Soybean.	

SPRAY PREPARATION and CLEAN-UP

Spray equipment should be clean and free of previous pesticide deposits or residue before using **Rimsulfuron-S 25% SG** followed by proper cleaning after application. Before applying **Rimsulfuron-S 25% SG**, clean all application equipment, following the clean-up procedures specified on the label of the product previously sprayed. Use the procedure that follows, if no clean-up procedure is provided. Thoroughly clean all mixing and spray equipment to avoid subsequent adverse crop response immediately after application of **Rimsulfuron-S 25% SG**.

Clean-Up Procedure

1. Drain the spray tank and thoroughly hose down the inside surfaces. Flush the hoses, boom and tank with clean water for at least 5 min.
2. Fill the tank partially with clean water. For every 100 gallons of water, and add one gallon of household ammonia*** (that contains 3% active). Finish filling the tank with water, then flush the cleaning solution through the boom, hoses, and nozzles. Completely fill the tank with water and agitate/recirculate for at least 15 min. Again, flush the boom, hoses, and nozzles with the cleaning solution. Drain the tank.
3. Repeat Step 2.
4. Remove and clean the nozzles and screens separately in a container with the cleaning agent and water.
5. Rinse the tank with clean water thoroughly for a minimum of 5 minutes, flushing the water through the boom and hoses.

***Equivalent amounts of an alternate strength ammonia solution or a tank cleaner recommended by the equipment manufacturer may be used.

Notes:

1. Read and follow product label directions for proper disposal of rinsate.
2. To dislodge any visible pesticide deposits, steam-cleaning of aerial spray tanks should be conducted.
3. When spraying or using mixing equipment over an extended period of time with **Rimsulfuron-S 25% SG**, partially fill the tank with fresh water at the end of each day of spraying, flush the boom and hoses, and allow to sit overnight.

MANDATORY SPRAY DRIFT MANAGEMENT**Aerial Applications:**

- **Do not** release spray at a height greater than 10 ft. above the vegetative canopy, unless a greater application height is necessary for pilot safety.
- For applications prior to the emergence of crops and target weeds, applicators are required to use a coarse or coarser droplet size (ASABE S572.1).
- For all other applications, applicators are required to use a medium or coarser droplet size (ASABE S572.1).
- The boom length must not exceed 65% of the wingspan for airplanes or 75% of the rotor blade diameter for helicopters.
- Applicators must use ½ swath displacement upwind at the downwind edge of the field.
- Nozzles must be oriented, so the spray is directed toward the back of the aircraft.
- **Do not** apply when wind speeds exceed 10 miles per hour at the application site.
- **Do not** apply during temperature inversions.

Ground Boom Applications:

- Apply with the nozzle height recommended by the manufacturer, but no more than 3 feet above the ground or crop canopy unless making a turf, pasture, or rangeland application, in which case applicators may apply with a nozzle height no more than 4 feet above the ground.
- For applications prior to the emergence of crops and target weeds, applicators are required to use a coarse or coarser droplet size (ASABE S572.1).
- For all other applications, applicators are required to use a medium or coarser droplet size (ASABE S572.1).
- **Do not** apply when wind speeds exceed 10 miles per hour at the application site.
- **Do not** apply during temperature inversions.

Boom-less Ground Applications:

- Applicators are required to use a medium or coarser droplet size (ASABE S572.1) for all applications.
- **Do not** apply when wind speeds exceed 10 miles per hour at the application site.
- **Do not** apply during temperature inversions.

SPRAY DRIFT ADVISORIES

THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT. BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL CONDITIONS.

IMPORTANCE OF DROPLET SIZE

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Controlling Droplet Size - Ground Boom

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- **Pressure** - Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. WHEN HIGHER FLOW RATES ARE NEEDED, USE A HIGHER-CAPACITY NOZZLE INSTEAD OF INCREASING PRESSURE.
- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles.

Controlling Droplet Size - Aircraft

- **Adjust Nozzles** - Follow nozzle manufacturers recommendations for setting up nozzles. Generally, to reduce fine

droplets, nozzles should be oriented parallel with the airflow in flight.

BOOM HEIGHT - Ground Boom

Use the lowest boom height that is compatible with the spray nozzles that will provide uniform coverage. For ground equipment, the boom should remain level with the crop and have minimal bounce.

RELEASE HEIGHT - Aircraft

Higher release heights increase the potential for spray drift. When applying aurally to crops, **do not** release spray at a height greater than 10 ft. above the crop canopy, unless a greater application height is necessary for pilot safety.

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

TEMPERATURE AND HUMIDITY

When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

TEMPERATURE INVERSIONS

Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

WIND

Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS. Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

Boom-less Ground Applications:

- Setting nozzles at the lowest effective height will help to reduce the potential for spray drift.

Handheld Technology Applications:

- Take precautions to minimize spray drift.

AIR-ASSISTED (AIR BLAST) FIELD CROP SPRAYERS

Air-assisted field crop sprayers carry droplets to the target via a downward-directed airstream. Some may reduce the potential for drift, but if a sprayer is unsuitable for the application and/or set up improperly, high drift potential can result. It is the responsibility of the applicator to determine that a sprayer is suitable for the intended application and is configured properly, and that drift is not occurring.

BIOLOGICAL ACTIVITY AND ENVIRONMENTAL CONDITIONS

Rimsulfuron-S 25% SG rapidly inhibits the growth of susceptible weeds by absorption through the roots of plants. Moisture (rainfall or sprinkler irrigation) is needed to move **Rimsulfuron-S 25% SG** into the soil. If applications are made pre-emergence, susceptible weeds will typically be controlled. In some situations, weeds may germinate and emerge a few days after application, but growth will cease with leaves becoming chlorotic 3 to 5 days after emergence. Biological response varies by species, death of leaf tissue and growing point will follow in some species, while others will remain green but stunted and noncompetitive.

Rimsulfuron-S 25% SG may be less effective on weeds stressed from adverse environmental conditions (such as extreme temperatures or moisture), sub-optimal growing conditions, abnormal soil conditions, or cultural practices.

WEED RESISTANCE MANAGEMENT

Rimsulfuron-S 25% SG contains rimsulfuron and is classified as a Group 2 herbicide, Acetolactate Synthase (ALS) or Acetohydroxy Acid Synthase (AHAS) inhibitor.

Herbicide resistance is defined as the inherited ability of a plant to survive and reproduce following exposure to a dose of herbicide normally lethal to the wild type. In a plant, resistance may be naturally occurring or induced by such techniques as genetic engineering or selection of variants produced by tissue culture or mutagenesis. Any weed population may contain or develop plants that are naturally resistant to **Rimsulfuron-S 25% SG** and other Group 2 herbicides. Weed species with acquired resistance to Group 2 herbicides may eventually dominate the weed population if Group 2 herbicides are used repeatedly in the same field or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by **Rimsulfuron-S 25% SG** or other Group 2 herbicides.

Indicators of possible herbicide resistance include: (1) failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds; (2) a spreading patch of non-controlled plants of a particular weed species; (3) surviving plants mixed with controlled individuals of the same species. If resistance is suspected, prevent weed seed production in the affected area by an alternative herbicide from a different group or by a mechanical method such as hoeing or tillage. Prevent movement of resistant weed seeds to other fields by cleaning harvesting and tillage equipment when moving between fields and planting clean seed. If a weed pest population continues to progress after treatment with this product, discontinue use of this product, and switch to another management strategy or herbicide with a different mode of action, if available.

To delay herbicide resistance, consider:

- Avoiding the consecutive use of **Rimsulfuron-S 25% SG** or other target site of action Group 2 herbicides that have a similar target site of action, on the same weed species.
- Using tank mixtures or premixes with herbicides from different target site of action Groups as long as the involved products are all registered for the same use, have different sites of action, and are both effective at the tank mix or prepack rate on the weed(s) of concern.
- Basing herbicide use on a comprehensive Integrated Pest Management (IPM) program.
- Monitoring treated weed populations for loss of field efficacy.
- Users should scout before and after application. Users should report lack of performance to registrant or their representative. Contact your local sales representative, extension agent, or certified crop advisors to find out if suspected resistant weeds to this MOA have been found in your region. If resistant biotypes of target weeds have been reported, use the application rates of this product specified for your local conditions. Tank mix products so that there are multiple effective mechanisms of action for each target weed.

INTEGRATED PEST MANAGEMENT

Integrate **Rimsulfuron-S 25% SG** into an overall weed pest management strategy whenever the use of an herbicide is required. Practices known to reduce weed development (tillage, crop competition) and herbicide use (weed scouting, proper application timing, banding) should be followed wherever possible. Consult local agricultural and weed authorities for additional IPM strategies established for your area.

SOIL INSECTICIDE

INTERACTION INFORMATION

There may be interactions with certain insecticides previously applied to the crop. Adverse crop response varies with corn type, insecticide used, the application method used for the insecticide product, and the soil type. **Rimsulfuron-S 25% SG** may be applied to corn previously treated with the following soil applied products: "Aztec", "Fortress", or "Force" insecticides or non-organophosphate (OP) soil insecticides regardless of soil type.

RESTRICTIONS:

- **Do not** make applications of **Rimsulfuron-S 25% SG** within 60 days of crop emergence where an organophosphate insecticide (such as "Counter") was applied as an in-furrow treatment since adverse crop response may occur. Allow at least 60 days between a pre-emergence or pre-plant application of **Rimsulfuron-S 25% SG** and application of an organophosphate insecticide since adverse crop response may result.
- **DO NOT** make applications of **Rimsulfuron-S 25% SG** to corn previously treated with "Counter" 15G or to corn treated with "Counter" 20CR as an in-furrow application or over the row at cultivation.
- Applications of **Rimsulfuron-S 25% SG** to corn previously treated with "Counter" 20CR, "Lorsban", or "Thimet" may cause unacceptable adverse crop response and injury, especially on soils that contain less than 4% organic matter.
- **Do not** allow livestock to graze, or feed forage, grain or fodder (stover) from treated areas within 30 days of **Rimsulfuron-S 25% SG** application.

Injury, loss or adverse crop response of desirable trees or vegetation may result from failure to observe the following:

- **Do not** make applications of **Rimsulfuron-S 25% SG** or drain or flush application equipment on or near desirable trees or other plants, or on areas where their roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.
- **Do not** use on driveways, lawns, tennis courts, walks or similar areas.
- Prevent spray drift to desirable plants.
- **Do not** contaminate bodies of water.
- Clean application equipment thoroughly, immediately after use. (See **SPRAY PREPARATION and CLEAN-UP** section of this label for additional information).
- Carefully observe sprayer cleanup instructions, as spray tank residue may damage crops other than potatoes or tomatoes.
- **Do not** apply using Air Assisted (Air Blast) field-crop sprayers.

If there are prolonged periods of cold weather and/or in conjunction with wet soils, adverse crop response may occur following an application of **Rimsulfuron-S 25% SG**.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store product in original container only. Store in a cool, dry place.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

NONREFILLABLE CONTAINER (LESS THAN 50 LBS.)

Nonrefillable container: **Do not** reuse or refill this container. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

NONREFILLABLE CONTAINERS (GREATER THAN 50 LBS.)

Nonrefillable container: **Do not** reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

REFILLABLE CONTAINERS

Refillable container: Refill this container with pesticide only. **Do not** reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of this product, which are beyond the control of ROTAM AGROCHEMICAL COMPANY LIMITED or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and

User, and Buyer and User agree to hold ROTAM AGROCHEMICAL COMPANY LIMITED and Seller harmless for any claims relating to such factors.

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